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## Mars Khaimov Law, PLLC

### Via ECF

The Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

December 29, 2022

Re: *Luis Toro v. Animation Shops, Inc.*  
Case No. 22-cv-6934-JPC

Dear Judge Woods:

Plaintiff's Counsel submits this letter-motion to request an adjournment of the initial pretrial conference, currently scheduled to take place on January 3, 2023. Plaintiff's Counsel is currently traveling with intermittent access to reliable telephone service. As such, Counsel requests that the conference be adjourned to February 3, 2023, as Counsel's calendar is quite full during the rest of January. Defense Counsel has also agreed to the adjournment, and this is the first time this relief is being requested. The Parties also request that the pre-conference submission deadline be extended to one-week before the new conference date.

Plaintiff thanks the Court for its attention and consideration herein.

**Respectfully and sincerely,**

**/s/ Mars Khaimov, Esq.**

**Cc: Andrea Batres, Esq.**

The request is granted in part. The IPTC is adjourned until February 2, 2023, at 11:30 a.m., and the parties shall submit the required joint letter and proposed civil case management plan and scheduling order by January 26, 2023.

SO ORDERED

Date: December 30, 2022  
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan".

JOHN P. CRONAN  
United States District Judge

